

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22786-ALTONAGA/Reid

DINNTECO INTERNATIONAL, S.L., an
entity of Andorra la Vella,

Plaintiff,

v.

CAPITOL ELECTRONIC SALES, INC, an
Indiana corporation; EMP DEFENSE, LLC, a
Michigan limited liability company;
SEAHAWKE MARINE INC, a Florida
corporation; RIPPING IT OUTDOORS LLC,
a Florida limited liability company; and JAY
BHARAT KOTHARI d/b/a EMP Solutions,
an individual residing in the state of Florida,

Defendants.

**NOTICE OF VOLUNTARY DISMISSAL, WITHOUT PREJUDICE, OF ACTION
AGAINST DEFENDANT, RIPPING IT OUTDOORS LLC**

Plaintiff, Dinnteco International, SL, by and through undersigned counsel, and pursuant to Fed.R.Civ.P. 41 (a)(1)(A)(i), hereby dismisses this action, without prejudice, with each party to bear its own fees and costs, solely as to Defendant, Ripping It Outdoors LLC.

Plaintiff's dismissal of this action solely as to Defendant, Ripping It Outdoors, LLC, shall in no way impact Plaintiff's action and claims against the remaining Defendants, all of which shall remain in place.

[Signatures on next page]

Dated: September 5, 2025

Respectfully submitted,

/s/ Elio F. Martinez, Jr.

Elio F. Martinez, Jr.

Fla. Bar. No. 501158

elio.martinez@gray-robinson.com

GRAY | ROBINSON, P.A.

50 N. Laura Street

Sutie 1100

Jacksonville, Florida 32202

Tel: (904) 598-9929

Fax: (904) 598-9109

Francesca Russo

Fla. Bar. No. 174912

francesca.russo@gray-robinson.com

GRAY | ROBINSON, P.A.

333 S.E. 2nd Ave., Suite 3200

Miami, Florida 33131

Tel: (305) 416-6800

Fax: (305) 416-6887

Attorneys for Plaintiff

Dinnteco International, S.L.

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document was served via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing on all counsel or parties of record on the Service List below.

/s/ Elio F. Martinez, Jr.
Elio F. Martinez, Jr.